

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Donna Picerni, Individually and on behalf of all others similarly situated, Plaintiff, -v- Bilingual SEIT & Preschool Inc., Defendant.	Civ. Action #: 12-CV-4938 (BMC) <u>ACCEPTANCE OF RULE 68 OFFER OF JUDGMENT</u>
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TO: Mr. Gerald Green, Esq.

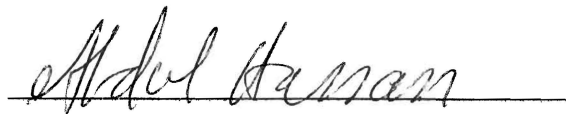
Counsel for Defendant Bilingual SEIT & Preschool Inc.
479 Merrick Road, Lynbrook, NY 11563
Tel: 516-561-8580 - Fax: 516-561-6716

PLEASE TAKE NOTICE, that Plaintiff Donna Picerni, pursuant to Rule 68 of the Federal Rules of Civil Procedure, hereby accepts the attached Offer of Judgment of Defendant Bilingual SEIT & Preschool Inc., dated October 19, 2012, in the above-entitled action.

Dated: Queens Village, New York

October 19, 2012

Respectfully submitted,



Abdul K. Hassan, Esq. (AH6510)
Counsel for Plaintiff Donna Picerni
215-28 Hillside Avenue
Queens Village, NY 11427
Tel: 718-740-1000
Fax: 718-468-3894

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

<p>Donna Picerni, Individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">-v-</p> <p>Bilingual SEIT & Preschool Inc.,</p> <p style="text-align: center;">Defendant.</p>	<p>Civ. Action #: 12-CV-4938 (BMC)</p> <p style="text-align: center;"><u>RULE 68 OFFER OF JUDGMENT</u></p>
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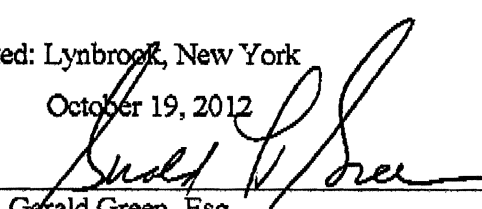
TO: **ABDUL K. HASSAN, ESQ.**
Counsel for Plaintiff Donna Picerni
215-28 Hillside Avenue, Queens Village, NY 11427
Tel: 718-740-1000 – Fax: 718-468-3894

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant Bilingual SEIT & Preschool Inc., hereby offers to allow judgment to be taken against it in this action and in favor of plaintiff Donna Picerni, in the amount of five thousand dollars (\$5,000) in damages, plus four hundred and ten dollars (\$410) in costs, and four thousand, five hundred and ninety dollars (\$4,590) in attorney's fees payable to plaintiff's counsel Abdul K. Hassan, Esq., which represents 7.65 hours at \$600 an hour.

The \$5000 payment to plaintiff Picerni shall be made on or before October 24, 2012, and the \$5,000 payment to plaintiff's counsel Abdul K. Hassan, Esq., shall be made on or before December 19, 2012.

Dated: Lynbrook, New York

October 19, 2012



Mr. Gerald Green, Esq.
Counsel for Defendant Bilingual SEIT & Preschool Inc.
479 Merrick Road, Lynbrook, NY 11563
Tel: 516-561-8580 - Fax: 516-561-6716

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Donna Picerni, Individually and on behalf of all others similarly situated, <div style="text-align: right;">Plaintiff,</div> <div style="text-align: center;">-v-</div> Bilingual SEIT & Preschool Inc., <div style="text-align: right;">Defendant.</div>	Civ. Action #: 12-CV-4938 (BMC) <u>PROOF OF SERVICE</u> (Acceptance – Offer of Judgment)
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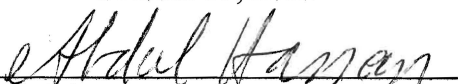
ABDUL KARIM HASSAN, ESQ., an attorney duly admitted to practice before this Court and a member of the Bar of the State of New York, states the following under penalty of perjury:

1. I am legal counsel to Plaintiff in the above-entitled action;
2. That on the 19th day of October 2012, I served Plaintiff's within acceptance of the offer of judgment on Defendant, in the above-entitled action, by enclosing a true copy thereof in an envelope, properly addressed, sealed and paid for, and deposited into the exclusive custody and control of the United States Postal Service for delivery by first class mail to:

TO: **Mr. Gerald Green, Esq.**
Counsel for Defendant Bilingual SEIT & Preschool Inc.
479 Merrick Road, Lynbrook, NY 11563
Tel: 516-561-8580 - Fax: 516-561-6716

3. I am over the age of 18 and not a party to this action

Dated: Queens Village, New York
October 19, 2012


Abdul K. Hassan, Esq. (AH6510)
Counsel for Plaintiff Donna Picerni
215-28 Hillside Avenue
Queens Village, NY 11427